

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

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U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST OF COLUMBUS

UNITED STATES OF AMERICA

Plaintiff,

v.

STEPHEN CHINN

Defendant.

CASE NO.

JUDGE

INDICTMENT

18 U.S.C. §§ 2252(a)(1) & (b)(1)

18 U.S.C. §§ 2252(a)(2) & (b)(1)

18 U.S.C. §§ 2252(a)(4)(B) & (b)(2)

FORFEITURE ALLEGATION

THE GRAND JURY CHARGES:

COUNT ONE

(Transportation of Child Pornography)

1. On or about May 29, 2023, in the Southern District of Ohio, the defendant, **STEPHEN CHINN**, did knowingly transport one or more visual depictions using any means and facility of interstate and foreign commerce, including the internet, the production of such visual depictions having involved the use of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), and such depictions being of such conduct, to wit: digital image files depicting female prepubescent minors engaged in genital-to-genital and oral-to-genital sexual intercourse, bestiality, sadistic and masochistic abuse, and the lascivious exhibition of the genitalia and anus.

In violation of 18 U.S.C. §§ 2252(a)(1) & (b)(1).

COUNT TWO
(Receipt of Child Pornography)

2. Between on or about August 11, 2023 through on or about August 13, 2023, in the Southern District of Ohio, the defendant, **STEPHEN CHINN**, did knowingly receive one or more visual depictions using any means and facility of interstate and foreign commerce, including the internet, the production of such visual depictions having involved the use of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), and such depictions being of such conduct, to wit: female prepubescent minors engaged in genital-to-genital, oral-to-genital, and anal-to-genital sexual intercourse, masturbation, bestiality, sadistic and masochistic abuse, and the lascivious exhibition of the genitalia and anus.

In violation of 18 U.S.C. §§ 2252(a)(2) & (b)(1).

COUNT THREE
(Possession of Child Pornography)

3. On or about August 16, 2023, in the Southern District of Ohio, the defendant, **STEPHEN CHINN**, knowingly possessed matter, that is, digital image and video files stored on a TeamGroup MP33Pro Hard Drive, which contained one or more visual depictions that had been transported using any means and facility of interstate and foreign commerce, the production of such visual depictions having involved the use of pubescent minors engaging in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), and such visual depictions being of such conduct.

In violation of 18 U.S.C. § 2252(a)(4)(B) & (b)(2).

FORFEITURE ALLEGATION

4. The allegations of this Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeitures to the United States of America pursuant to 18 U.S.C. § 2253.

5. Upon conviction of any of the offenses alleged in this Indictment in violation of 18 U.S.C § 2252, the defendant, **STEPHEN CHINN**, shall forfeit to the United States:

- a. all matter containing visual depictions or child pornography and child erotica, transported, mailed, shipped or received in violation of 18 U.S.C. § 2252; and
- b. all property used or intended to be used to commit and to promote the commission of a violation of 18 U.S.C. § 2252, including, but not limited to the following:
 - i. A black unbranded desktop computer including its TeamGroup MP33Pro Hard Drive bearing serial number 1F2211080080136, and its contents.

Forfeiture notice in accordance with 18 U.S.C. § 2253(a)(1) and (3) and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/Foreperson

GRAND JURY FOREPERSON

KENNETH L. PARKER
UNITED STATES ATTORNEY



EMILY CZERNIEJEWSKI (IL 6308829)
Assistant United States Attorney